Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Omega Natchiq, Inc.
New Iberia Facility
New Iberia, Iberia Parish, Louisiana
Agency Interest Number: 24729
Activity Number: PER20070001

Draft Permit 1260-00085-V1

I. APPLICANT:

Company:
Omega Natchiq, Inc.
P.O. Box 10340
New Iberia, LA 70562-0340

Facility:
New Iberia Facility
101 Irish Bend Road, New Iberia, LA
Approximate UTM coordinates are 516.120 kilometers East and 3311.668 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Omega Natchiq, Inc.'s New Iberia Facility constructs mid-size to large structures used in oilfield exploration and production operations. The manufactured equipment includes offshore drilling systems, subsea production systems and completions systems for land and platform operations. Typical activities performed onsite include cutting and welding of raw metal, structure assembly, metal fabrication, sandblasting, painting and related support activities. The main sources of air emissions include volatile organic compounds (VOCs) from painting and solvent cleanup operations, nitrogen oxide compounds (NOx) emissions from internal combustion engines, and particulate matter (PM) from painting and sandblasting.

The facility began operation in October of 1990. The New Iberia Facility currently operates under Permit No. 1260-00085-V0, issued March 18, 2005.

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III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by Omega Natchiq on December 27, 2007 requesting a Part 70 operating permit along with supplemental information dated, August 28, 2008.

Project description

Omega Natchiq, Inc. is modifying their current permit and requesting a Part 70 Operating Permit. Omega is proposing the following modifications:

1. Increase the amount of paints, solvents, thinners and abrasive blasting material being used,
2. Remove gallon restrictions on paint, solvent and thinner and place an emisisons CAP on Total Volatile Organic Carbon (VOCs) for facility and Total Toxic Air Pollutants (TAPs) (131.01 tons/yr of VOC and 51.00 tons/yr of TAP/HAP),
3. Increase the amount of Methanol usage, and
4. Add Solvent Recovery Still (SRS-01).

Permitted Air Emissions

Estimated changes in permitted emissions in tons per year are as follows:

Pollutant	Permitted Before	Permitted After	Permitted Change
PM_{10}	8.21	48.84	+40.63
SO_2	4.03	4.03	-
NOx	61.28	62.19	+0.91
CO	13.20	13.20	-
VOC	120.14	135.87	+15.73

LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs) in tons per year:	
n-Butanol	5.000
Methyl Ethyl Ketone	5.000
Methyl Isobutyl Ketone	5.000
Xylene	14.004
Benzene	0.013
Toluene	23.006
Ethyl benzene	8.000
Naphthalene	2.000
Methanol	10.000
Glycol Ethers	5.000
Hexamethylene diisocyanate	0.031

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LAC 33:III Chapter 51 Non-VOC Toxic Air Pollutants (TAPs):	
Zinc and Compounds	2.000
Chromium IV and Compounds	0.286
Cobalt and Compounds	<0.001
Manganese and Compounds	2.115
Nickel and Compounds	0.104
Copper and Compounds	0.215
Total TAPS	**51.00**

Prevention of Significant Deterioration Applicability

No physical changes in or change in the method of operation are being made to the facility. The major emission changes are due to the increase in use of paints, thinners, and solvents; therefore, PSD does not apply and a netting analysis is not required.

MACT requirements

This facility must comply with NESHAP 40 CFR 63 Subpart MMMM Miscellaneous Metal Parts Surface Coating and perform Good Housekeeping Practices as LAC 33:III 5109.A MACT.

Air Modeling Analysis

Dispersion Model(s) Used: AERMOD

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
PM_{10}	24 hr	139.08	150.00
PM_{10}	Annual	35.84	50.00

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

IV. Permit Shields

There is no permit shield.

V. Periodic Monitoring

The New Iberia Facility shall monitor emissions of Total VOCs and Total Toxic air pollutants (TAPs) by technically sound method monthly. These emissions shall be calculated using the quantities of each type of the applied paint, solvent, and thinner in connection with the data from the corresponding MSDS sheet as submitted in the application. Noncompliance with this limitation is a reportable violation of the permit.

The New Iberia Facility shall keep records of the emissions of total VOCs and Toxic air pollutants (TAP) by electronic or hard copy weekly. Keep records of the total VOC and TAP emissions each month, as well as the total emissions for the last twelve months. Make records available for inspection by DEQ personnel. The New Iberia Facility shall also keep records of the quantity of paints, solvents, and thinners by electronic or hard copy daily. Keep records of the total paints, solvents, and thinners used each month, as well as the total usage for the last twelve months. Make records available for inspection by DEQ personnel.

The New Iberia Facility shall submit a report, due annually, by the 31st of March. Report the total VOC and TAP emissions for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

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VI. Applicability and Exemptions of Selected Subject Items

ID No:	Requirement	Notes
Facility Wide	Pumps and Compressors [LAC 33:III.2111]	DOES NOT APPLY. There are no pumps and/or compressors on site that directly pump organic compounds.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.Chapter 59]	DOES NOT APPLY. Facility does not produce, process, handle, or store listed substances in quantities greater than the listed threshold quantities.
3-96 Abrasive Blasting	Compliance Assurance Monitoring [40 CFR Part 64.1]	DOES NOT APPLY. The use of a tarp constitutes a passive control and is not subject to CAM.
DE-01 Diesel Engines	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63 subpart ZZZZ]	EXEMPT. The requirements of 40 CFR Part 63 subpart ZZZZ are fulfilled by meeting the requirements of 40 CFR Part 60 subpart IIII [§63.6590(c)].
	Emission Standards for Sulfur Dioxide LAC 33:III.Chapter 15	DOES NOT APPLY. Unit emits <5 tons/yr.

VII. Streamlined Requirements

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
New Iberia Facility	None	-	-

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VIII. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) – A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane

(CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10}- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulphur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.